

### **REMARKS**

Claims 1-15 are currently pending in the subject application, and are presently under consideration. Claims 16-36 are withdrawn. Claims 1, 3-4 and 13-15 are rejected. Claims 2 and 5-12 have been indicated as allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Favorable reconsideration of the application is requested in view of the amendments and comments herein.

#### **I. Objections to the Drawings**

The drawings have been objected to for failing to comply with 37 C.F.R. §1.121(d) for failing to have reference characters of at least 0.32 cm in height. Formal replacement drawings submitted with this amendment include characters of at least 0.32 cm in height. Due to space limitations, 16 pages of drawings are being submitted to replace the original 13 pages of drawings filed with the Application. Moreover, the replacement drawings include an amendment to FIG. 5, wherein a reference number "10" has been added. The amendment to FIG. 5 is supported by at least page 8, lines 26-30. FIG. 14(a) has been amended to remove a text box in the upper right corner of the drawing. FIG. 8 has been amended to maintain consistency with FIGS. 6 and 7. No new matter has been added. Applicant's representative respectfully submits that the replacement drawings comply with 37 C.F.R. §1.121(d), and thus are no longer objectionable. Accordingly, withdrawal of this objection is respectfully requested.

#### **II. Rejection of Claims 1, 3, 4 and 13-15 Under 35 U.S.C. §102(b)**

Claims 1, 3, 4 and 13-15 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Publication No. 2004/0199573 to Schwartz, et al. Withdrawal of this rejection is respectfully requested for at least the following reasons.

Schwartz does not disclose a topological map of a target system that has nodes that correspond to components of the target system that has nodes that correspond to components of the target system and links that correspond to connections between components, as recited in claim 1. In rejecting claim 1, the Examiner contends that paragraphs [0002] and [0014] of

Schwartz disclose the topographical map recited in claim 1 (See Office Action, Page 3). Applicant's representative respectfully disagrees. Paragraph [0014] of Schwartz discloses that a system can maintain a database correlating individual pieces of equipment to any corresponding basic components that it includes. Nothing in the cited sections of Schwartz, or any other section of Schwartz, discloses use of a topological map, as recited in claim 1. Instead, Schwartz is limited to modeling components by decomposing each individual component to a "small set of basic components" (See, Schwartz, Par. [0014]). That is, Schwartz does not disclose modeling the overall structure of a target system, or the interlinking of components, in contrast to the topological map recited in claim 1. Accordingly, Schwartz does not disclose the topological map recited in claim 1.

Moreover, Schwartz does not disclose a knowledge store that has a structure that reflects or corresponds to that of the topological map, the store having a plurality of sections or libraries each of which is provided for storing data associated with one of the nodes defined in the topological map, as recited in claim 1. In rejecting claim 1, the Examiner contends that paragraphs [0013] and [0014] of Schwartz disclose the knowledge store recited in claim 1 (See Office Action, Page 3). Applicant's representative respectfully disagrees. Paragraph [0013] of Schwartz discloses that a new failure condition pattern can be recognized as preceding such a failure stored in the knowledge database, while paragraph [0014] of Schwartz discloses that various expert-define equipment disorder patterns are related to such basic components. Thus, Schwartz is limited to the storage of expert-defined patterns, based around decomposed basic components. In Schwartz, faults are diagnosed by a statistical comparison with disorder patterns across the basic components. In contrast to Schwartz, in claim 1, diagnosis is performed across the whole system of components. Accordingly, Schwartz fails to disclose a knowledge store that has a structure that reflects or corresponds to that of a topological map, the store having a plurality of sections or libraries each of which is provided for storing data associated with one of the nodes defined in the topological map, as recited in claim 1.

Further still, Schwartz does not disclose means for diagnosing faults using data in a topological map and the knowledge store, as recited in claim 1. In rejecting claim 1, the

Examiner contends that the Abstract and paragraphs [0005] and [0013] of Schwartz discloses this element of claim 1 (See Office Action, Page 3). Applicant's representative respectfully disagrees. The Abstract of Schwartz discloses predefined patterns for known disorders. Paragraph [0005] of Schwartz discloses that expert systems are not sophisticated enough to provide reliable diagnosis of failure of geographically distributed objects, while paragraph [0013] of Schwartz discloses a knowledge base of failure patterns is maintained such that information in the knowledge base may be used to diagnose equipment. However, nothing in the cited sections of Schwartz (or elsewhere in Schwartz), discloses any structure or function for diagnosing faults using a topological map and a knowledge base that has a structure that reflects or corresponds to that of the topological map, in contrast to the means for diagnosing, as recited in claim 1. Thus, Schwartz does not disclose the means for diagnosing, as recited in claim 1. Therefore, in view of the foregoing, Schwartz does not anticipate claim 1. Consequently, claim 1, as well as claims 3, 4 and 13 depending therefrom, should be patentable over the cited art.

Claims 14 and 15 recite subject matter similar to that of claim 1. Thus, for reasons similar to those discussed with respect to claim 1, claims 14 and 15 are not anticipated by Schwartz. Accordingly, claims 14 and 15 should be patentable over the cited art.

For the reasons described above, claims 1, 3, 4 and 13-15 should be patentable over the cited art. Accordingly, withdrawal of this rejection is respectfully requested.

**CONCLUSION**

In view of the foregoing remarks, Applicant respectfully submits that the present application is in condition for allowance. Applicant respectfully requests reconsideration of this application and that the application be passed to issue.

Please charge any deficiency or credit any overpayment in the fees for this amendment to our Deposit Account No. 20-0090.

Respectfully submitted,

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/Christopher P Harris/

Christopher P. Harris  
Registration No. 43,660

CUSTOMER No.: 26,294

TAROLLI, SUNDHEIM, COVELL, & TUMMINO L.L.P.  
1300 EAST NINTH STREET, SUITE 1700  
CLEVELAND, OHIO 44114  
Phone: (216) 621-2234  
Fax: (216) 621-4072